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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CENTER FOR BIOLOGICAL DIVERSITY,
KENTUCKY ENVIRONMENTAL
FOUNDATION, and SIERRA CLUB

Plaintiffs,

vs.

RURAL UTILITIES SERVICES, a federal agency
Within the United States Department of Agriculture

Defendant,

and

EAST KENTUCKY POWER COOPERATIVE,
INC.

Intervenor-Defendant.

Case No. C08-1240-MMC

**EAST KENTUCKY POWER
COOPERATIVE, INC.'S PROPOSED
CONCURRENCE IN DEFENDANT
RUS'S MOTION TO TRANSFER
VENUE**

Date: June 27, 2008
Time: 9:00 a.m.
Honorable Maxine M. Chesney
Courtroom 7, 19th Floor

1 East Kentucky Power Cooperative, Inc. ("EKPC") tenders this Proposed Concurrence in
 2 support of Defendant Rural Utilities Service's ("RUS") Amended Motion to Transfer Venue filed
 3 with this Court on May 7, 2008 (Dkt. #18). EKPC requests that the Court consider this Proposed
 4 Concurrence in the event that the Court grants EKPC's motion to intervene on the merits of this
 5 action, which motion EKPC intends to file on May 30, 2008.

6 For the reasons set forth in RUS's Supporting Memorandum of Points and Authorities filed
 7 with its original Motion to Transfer Venue on April 30, 2008 (Dkt. #10), EKPC concurs with RUS's
 8 Motion and requests that this Court transfer this action to the United States District Court for the
 9 District of Columbia, or in the alternative, to the Eastern District of Kentucky.

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 11 Dated: May 30, 2008

Respectfully submitted,

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 13 S/JOSÉ R. ALLEN

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